

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC,
PATENT LITIGATION

§
§
§
§
§
§
§
§

Case No. 2:22-md-03042-JRG

JURY TRIAL DEMANDED

THIS DOCUMENT RELATES TO ALL
ACTIONS

**PLAINTIFF TAASERA LICENSING LLC'S
UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT ON
OPENING, RESPONSIVE, AND REPLY CLAIM CONSTRUCTION BRIEFS**

Plaintiff Taasera Licensing LLC ("Taasera") respectfully seeks leave for the parties to exceed the page limits for the Opening Claim Construction Brief in compliance with P.R. 4-5(a) by an additional ten (10) pages, Responsive Claim Construction Brief in compliance with P.R. 4-5(b) by an additional fifteen (15) pages, and Reply Claim Construction Brief in compliance with P.R. 4-5(c) by an additional five (5) pages.

As indicated in the parties' Joint Claim Construction and Prehearing Statement in accordance with P.R. 4-3, the parties believe that exceeding the page limit on Opening, Responsive, and Reply Claim Construction Briefs is warranted here because there are currently 31 disputed claim terms, fifteen asserted patents, multiple Defendant groups in this MDL litigation, and certain asserted patents that are only asserted against a subset of the Defendants that require increased coordination efforts among the Defendants.

Defendants are not opposed to the relief sought in this Motion.

Dated: July 20, 2023

Respectfully submitted,

/s/ Alfred R. Fabricant

Alfred R. Fabricant

NY Bar No. 2219392

Email: ffabricant@fabricantllp.com

Peter Lambrianakos

NY Bar No. 2894392

Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III

NY Bar No. 4557435

Email: vrubino@fabricantllp.com

Joseph M. Mercadante

NY Bar No. 4784930

Email: jmercadante@fabricantllp.com

FABRICANT LLP

411 Theodore Fremd Avenue,

Suite 206 South

Rye, New York 10580

Telephone: (212) 257-5797

Facsimile: (212) 257-5796

Samuel F. Baxter

Texas State Bar No. 01938000

sbaxter@mckoolsmith.com

Jennifer L. Truelove

Texas State Bar No. 24012906

Email: jtruelove@mckoolsmith.com

MCKOOL SMITH, P.C.

104 E. Houston Street, Suite 300

Marshall, Texas 75670

Telephone: (903) 923-9000

Facsimile: (903) 923-9099

ATTORNEYS FOR PLAINTIFF

TAASERA LICENSING LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on July 20, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant

Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that all counsel of record have met and conferred in accordance with Local Rule CV-7(h) and this motion is unopposed.

/s/ Alfred R. Fabricant

Alfred R. Fabricant